

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 4:20-CR-418 JAR NAB
	)	
TERICA TANEISHA ELLIS,	)	
	)	
Defendant.	)	

**SUPPLEMENTAL MOTION FOR PRE-TRIAL DETENTION**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Angie E. Danis and Gwendolyn E. Carroll, Assistant United States Attorneys for said District, and moves the Court to order defendant detained pending trial. This Court has scheduled a detention hearing to take place on September 25, 2020 at 10:30 a.m..

As for its grounds, the Government states as follows:

1. As the Court is aware, the Pretrial Services Office has recommended detention in this case (Doc. No. 39-1), on the grounds that the defendant poses a risk of nonappearance due to her lack of familial, residential, employment, property or financial ties to the Eastern District of Missouri, her criminal history, which includes a Failure to Appear, and the nature of the pending charges, the minimum penalty for which is a term of life imprisonment were the defendant to be convicted.

2. The Pretrial Service Office has also recommended detention on the grounds that the defendant poses a risk of danger to the community, both given the nature of the offense with which the defendant is charged, and safety concerns for the community.
3. On September 2, 2020, District Judge Charmiane G. Claxton of the Western District of Tennessee conducted a detention hearing in this matter. The United States presented the testimony of St. Louis Metropolitan Police Department Detective Donald Thurmond, who offered testimony during his direct exam, and was cross-examined by counsel for the defendant.
4. At the conclusion of that hearing, the Court ordered the defendant detained, finding that “weighing all the factors” identified in the Bail Reform Act that the “presumption [of detention] has not been rebutted.” Tr., p. 50. The United States has filed a transcript of that proceeding as an exhibit to the present motion.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial.

Respectfully submitted,

JEFFREY B. JENSEN  
UNITED STATES ATTORNEY

/s/Gwendolyn E. Carroll

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/Gwendolyn E. Carroll

GWENDOLYN E. CARROLL, #4657003NY